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9 Attorneys for Defendant,  
JAMES RIVER INSURANCE COMPANY

13 DARNISHA JOHNSON, an individual, ) Case No. 2:20-cv-00399-JCM-EJY  
14 Plaintiff, )  
15 vs. )  
16 JAMES RIVER INSURANCE COMPANY, )  
17 an Illinois corporation; DOES I through X; )  
18 and ROE CORPORATIONS I through X, )  
19 inclusive, )  
Defendant. )  
\_\_\_\_\_  
)

20 All of the parties hereto, and for good cause described in this stipulation, and in  
21 accord with Local Rule 6-1 and Local Rule 26-4, the parties hereby request this  
22 Honorable Court to adopt and approve this stipulated extension to the discovery plan,  
23 and continue the discovery deadlines for 60-days as requested herein.

**I. LOCAL RULE 6-1 IS SATISFIED**

25 This is the fourth request for extension of discovery deadlines filed by the  
26 parties. Pursuant to the Stipulation and Order to Extend Discovery (Third Request),  
27 the following dates govern for purposes of discovery:

28 1. Discovery Cutoff Date: April 30, 2021

1       2. Dispositive Motions:

June 1, 2021

2       3. Joint Pre-Trial Order:

July 1, 2021

3           Due to Covid-19, there have been delays in obtaining Plaintiff's medical records  
 4 and conducting additional discovery. Defendant is still waiting on medical records  
 5 from a number of Plaintiff's providers. Additionally, Defendant has recently learned  
 6 that Plaintiff was in another accident and Defendant needs time to conduct discovery  
 7 regarding the same. Plaintiff is also in the process of supplementing her disclosures  
 8 and her responses to the written discovery, after which Defendant needs the  
 9 opportunity to conduct any further necessary discovery. Moreover, the parties would  
 10 like to reach a settlement and are in the process of trying to schedule a mediation. As  
 11 such, the parties are requesting a 60-day extension to all discovery deadlines.

12           The instant request comports with Local Rule 6-1, in that no request is being  
 13 made after the expiration of the specified period.

14           **I. LOCAL RULE 26-4 IS SATISFIED**

15           The instant request to extend discovery deadlines satisfies the requisites of Local  
 16 Rule 26-4. Additionally, good cause exists for the extension. Due to Covid-19, there  
 17 have been delays in obtaining Plaintiff's medical records and conducting additional  
 18 discovery. Defendant is still waiting on medical records from a number of Plaintiff's  
 19 providers. Additionally, Defendant has recently learned that Plaintiff was in another  
 20 accident and Defendant needs time to conduct discovery regarding the same. Plaintiff  
 21 is also in the process of supplementing her disclosures and her responses to the written  
 22 discovery, after which Defendant needs the opportunity to conduct any further  
 23 necessary discovery. Moreover, the parties would like to reach a settlement and are in  
 24 the process of trying to schedule a mediation. As such, the parties are requesting a 60-  
 25 day extension to all discovery deadlines.

26           Listed below is a statement specifying the discovery completed in this case:

27       Plaintiff's Rule 26 Initial Disclosures

April 21, 2020

1	Defendant James River Insurance Company's Initial Disclosure of Witnesses And Documents Pursuant to FRCP 26(a)(1)	April 23, 2020
3	Plaintiff's First Set of Discovery Requests	May 18, 2020
4	Defendant James River Insurance Company's Responses to Plaintiff's First Set of Requests For Admission	July 7, 2020
6	Defendant James River Insurance Company's Responses to Plaintiff's First Set of Requests For Production	July 7, 202
8	Defendant James River Insurance Company's Responses to Plaintiff's First Set of Interrogatories	July 7, 202
10	Defendant James River Insurance Company's First Set of Requests for Admission to Plaintiff Darnisha Johnson	August 18, 2020
12	Defendant James River Insurance Company's First Set of Requests for Production to Plaintiff Darnisha Johnson	August 18, 2020
14	Defendant James River Insurance Company's First Set of Interrogatories to Plaintiff Darnisha Johnson	August 18, 2020
16	Plaintiff's Responses to Defendant's First Set Of Requests For Admissions, Interrogatories, And Requests for Production of Documents	October 1, 2020
18	Plaintiff's Designation of Expert Witnesses And Documents	October 1, 2020
20	Defendant James River Insurance Company's Notice of Independent Medical Examination of Plaintiff (Set for November 2, 2020)	October 8, 2020
22	Defendant James River Insurance Company's Amended Notice of Independent Medical Examination of Plaintiff (Set for December 17, 2020)	November 12, 2020
24	Defendant James River Insurance Company's Company's First Supplement to Initial Disclosure of Witnesses And Documents Pursuant to FRCP 26(a)(1)	November 12, 2020
27	Deposition of Plaintiff Darnisha Johnson	December 14, 2020
28	Independent Medical Examination of Plaintiff Darnisha Johnson	December 17, 2020

1	Defendant James River Insurance Company's Company's Second Supplement to Initial Disclosure of Witnesses And Documents Pursuant to FRCP 26(a)(1)	February 22, 2021
2	Defendant James River Insurance Company's Initial Designation of Expert Witnesses Pursuant To F.R.C.P. 26(a)(2)(B)	March 1, 2021
3	Defendant James River Insurance Company's First Supplement to Designation of Expert Witnesses Pursuant To F.R.C.P. 26(a)(2)(B)	March 30, 2021
4	Defendant James River Insurance Company's Second Set of Requests for Admission to Plaintiff Darnisha Johnson	March 30, 2021
5	Defendant James River Insurance Company's Second Set of Requests for Production to Plaintiff Darnisha Johnson	March 30, 2021
6	Defendant James River Insurance Company's Second Set of Interrogatories to Plaintiff Darnisha Johnson	March 30, 2021
7	Defendant James River Insurance Company's Company's Amended Second Supplement to Initial Disclosure of Witnesses And Documents Pursuant to FRCP 26(a)(1)	March 31, 2021
8	The instant request to extend discovery deadlines satisfies the requisites of Local Rule 26-4. Additionally, good cause exists for the extension. Due to Covid-19, there have been delays in obtaining Plaintiff's medical records and conducting additional discovery. Defendant is still waiting on medical records from a number of Plaintiff's providers. Additionally, Defendant has recently learned that Plaintiff was in another accident and Defendant needs time to conduct discovery regarding the same. Plaintiff is also in the process of supplementing her disclosures and her responses to the written discovery, after which Defendant needs the opportunity to conduct any further necessary discovery. Moreover, the parties would like to reach a settlement and are in the process of trying to schedule a mediation. As such, the parties are requesting a 60- day extension to all discovery deadlines.	
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1 Finally, under Local Rule 26(4), it is necessary to articulate a proposed schedule  
2 for completing all remaining discovery. The parties are requesting an additional 60-  
3 days be afforded for discovery.

4 The following deadlines are requested.

5 1. Discovery Cutoff Date: June 29, 2021  
6 4. Dispositive Motions: July 29, 2021  
7 5. Joint Pre-Trial Order: August 30, 2021

8 The parties hereby stipulate to the proposed changes in the discovery deadlines.

9 Dated this 7<sup>th</sup> day of April, 2021 Dated this 7<sup>th</sup> day of April, 2021

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19 ORDER

20 IT IS SO ORDERED; provided, however, no  
21 further extensions of deadlines will be granted  
22 absent a demonstration of substantial progress  
23 toward completing all discovery necessitated by  
this dispute.

24   
25 UNITED STATES MAGISTRATE JUDGE

26 Dated: April 7, 2021  
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